

**UNITED STATES BANKRUPTCY COURT FOR THE
DISTRICT OF DELAWARE**

In re:

ZEN JV, LLC, *et al.*,¹

Debtors.

:
: **Chapter 11**
:
: **Case 25-11195 (JKS)**
:
: **(Jointly Administered)**
:
: **Hearing Date: November 13, 2025 at 1:00 p.m. (ET)**
: **Objection Deadline: October 30, 2025 at 4:00 p.m. (ET)**
:

**NOTICE OF MOTION FOR AN ORDER AUTHORIZING AND DIRECTING THE
IMMEDIATE PAYMENT OF THE ADMINISTRATIVE CLAIM OF SUSAN FALLON
PURSUANT TO 11 U.S.C §§ 503(b)(1)(A) and 507(a)(2)**

Susan Fallon (“Ms. Fallon”) filed the *Motion for an Order Authorizing and Directing the Immediate Payment of the Administrative Claim of Susan Fallon Pursuant to 11 U.S.C. §§ 503(b)(1)(A) and 507(a)(2)* (the “Motion”).

You are required to file a response to the Motion on or before **October 30, 2025 at 4:00 p.m. (Eastern Time)**.

At the same time, you must also serve a copy of the response upon Ms. Fallon’s attorneys:

David M. Klauder, Esquire
Bielli & Klauder, LLC
1204 N. King Street
Wilmington, DE 19801
Phone: (302) 803-4600
Email: dklauder@bk-legal.com

Hearing on the Motion will be held on **November 13, 2025 at 1:00 p.m. (Eastern Time)** before the Honorable J. Kate Stickles at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Wilmington DE 19801 in Courtroom Number 6.

¹ The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508) (collectively, the “Debtors”). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: October 14, 2025

Respectfully submitted,

BIELLI & KLAUDER, LLC

/s/ David M. Klauder

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